

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Joint Administration Requested)

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned hereby appear on behalf of LVS II SPE XXXIV LLC and B2 FIE XI LLC in the above-captioned bankruptcy case and such counsel hereby request, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Section 1109(b) of Title 11 of the United States Code, 11 U.S.C. §101, et seq. (the “Bankruptcy Code”), that copies of all notices and pleadings given or filed in these cases be given and served upon the undersigned at the following addresses, telephone numbers, and e-mail addresses indicated below:

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**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery,

telephone, telegraph, telex, or otherwise filed or made with regard to the referenced case and all proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that neither this notice nor any later appearance, pleading, claim, or suit shall waive (1) any right to have final orders in non-core matters entered only after *de novo* review, (2) any right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) any right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdraw, or (4) any other rights, claims, actions, setoffs, or recoupments to which LVS II SPE XXXIV LLC and B2 FIE XI LLC are may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: June 30, 2022

Respectfully submitted,

GREENBERG TRAURIG, LLP

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